J. M. Huber Corporation	**)**	**Department**
Aroostook County	**)**	**Findings of Fact and Order**
Easton, Maine	**)**	**Part 70 Air Emission License**
A-62-70-A-I	**)**	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	J. M. Huber Corporation
LICENSE NUMBER	A-62-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	2493
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	Station Road, Easton, Maine
DATE OF LICENSE ISSUANCE	July 31, 2003
LICENSE EXPIRATION DATE	July 31, 2008

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	**UNIT CAPACITY***	**UNIT TYPE**
Boiler #1	84 MMBtu/hr Wood 52.4 MMBtu/hr Oil	Fuel Burning
Temporary Package Boiler	< 52.4 MMBtu/hr Oil	Fuel Burning
Dryer No. 1	50 MMBtu/hr wood and/or oil	Process Equipment
Dryer No. 2	50 MMBtu/hr wood and/or oil	Process Equipment
Press	N/A	Process Equipment
Ink Jet Printer	9.2 gallons/day	Process Equipment
Blending and FormingVents	N/A	Process Equipment
Wood Dust Collection	N/A	Process Equipment
Gasoline Tank	550 gallons	Process Equipment
Parts Washers	N/A	Process Equipment
Edge Spraying	N/A	Process Equipment

* Unit capacities are nominal and listed for informational purposes only and are not intended as license restrictions.

Huber has additional insignificant activities which do not need to be listed in the emission equipment table above.

C. Application Classification

The application for Huber does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Process Description

J.M. Huber Corporation owns and operates an Oriented Strand Board (OSB) manufacturing facility in Easton, Maine.

In the production of OSB, logs are received at the plant by truck or rail and are stockpiled on site. The logs are soaked in hot water to thaw and clean the wood. They are then debarked and shaved into strands. These strands are then conveyed to green wood storage bins.

From the green wood storage bins, the strands are conveyed by induced draft through rotary dryers where the strands are heated to reduce the moisture content. Heat for the drying process is provided by direct fired wood burners and oil burners. Fuel for the wood burners is gathered primarily from the OSB process via screened dry wood fines, mat and panel trim, and sander dust.

After passing through the dryers, the dried strands are screened and stored in dry strand storage bins. From the dry storage bins, the strands are fed into blending drums where binders and wax are applied to the wood. The strands are then oriented into loosely formed mats and hot pressed to produce 8' x 16' sheets. A wood fired boiler provides steam heat to the press thermal oil system which, in turn, heats the press surfaces.

The pressed sheets are then trimmed into panels of the desired dimensions. The panels may also be sanded and/or provided with a tongue and groove edge. To prepare for shipment, the panels are stacked, some are edge sprayed and labeled

with an ink jet printer, and the panels are then strapped together. The finished product is then shipped to market by truck or rail.

Pollution control equipment for the above process includes a wet electrostatic precipitator (ESP) for each rotary dryer and cyclones, an electrified filter bed system (EFB) (which includes a bag house) for the wood fired boiler, and four bag houses for general processes that produce wood dust.

In 1982, Huber obtained from the Maine DEP a preconstruction air emission license issued pursuant to EPA's and Maine DEP's Prevention of Significant Deterioration (PSD) air licensing programs. That license authorized the conversion of an existing sugar beet refinery into a 240-ton/day waferboard manufacturing plant. In 1993, Huber again obtained a PSD air emission license from the Maine DEP pursuant to the PSD provisions of Chapter 115 of the Department's regulations and 40 CFR Part 51.166. The 1993 license was issued to permit Huber to undertake projects and make improvements to existing equipment to achieve a production increase to 425 tons/day of oriented strand board (OSB) or a higher production rate upon a demonstration by Huber that the applicable licensed emissions limits would be met at the higher production rate. The dryers and press underwent BACT review as part of the 1993 licensing. In addition, modeling was conducted which demonstrated that Huber, when emitting at maximum license limits, would meet state and federal ambient air quality standards and applicable increments. In 2000 and 2003, Huber's 1993 PSD air license was amended to permit Huber to undertake non-major modifications to achieve higher production levels as permitted in the 1993 PSD license. The 1993 air license, with the extensive BACT and air modeling, allows for Huber to undertake physical or operational changes to its existing equipment to achieve increased production levels provided these activities do not result in the emission of any pollutant beyond federally enforceable emission limits, production limits, or state air license limits and provided Huber demonstrates compliance with applicable emission limits at the higher production levels. This approach and authorization is carried forward into this Title V permit, which satisfies standard statement (1) and standard condition (2) of this license and the PSD provisions of Chapter 115 and 40 CFR Part 51.166. The emission limits in the 1993 PSD license, as amended, have been incorporated in the Order section of this Part 70 license.

B. Boiler # 1

Unit Size and Age

Boiler #1 was manufactured by Wellons, Inc. with a maximum design heat input of 84 MMBtu/hr firing wood and 52.4 MMBtu/hr firing No. 2 fuel oil. Boiler #1

provides steam for use in Huber's manufacturing process. Huber also provides steam from this boiler to the McCain's manufacturing facility which is adjacent to Huber. The boiler was installed in 1982, prior to the New Source Performance Standards (NSPS) Subpart Dc applicability date. The boiler underwent a BACT review as part of the 1982 PSD permitting of the plant. The boiler is equipped with cyclones and an electrified filter bed (EFB) for control of particulate matter emissions. Huber is permitted to burn wood and wood waste from the plant's manufacturing operations (including scrap OSB, pallets, untreated lumber and sawdust), waste office paper and cardboard generated on-site, No. 2 fuel oil, off-specification waste oil, grease, wax, particulate/water mixture from the wet ESP, and other non-hazardous wood product process residues. Emissions from Boiler #1, together with emissions from Dryers 1 and 2, exit through a single stack.

Huber is permitted to shut off the voltage to the electrified filter bed for an average of 10 minutes every 8 hours of operation to allow for inspection of gravel flow. In addition, Huber is not required to operate the electrified filter bed during startup until proper outlet operating temperature is achieved, or while burning only oil.

NOx RACT Requirements

Huber's Boiler #1 is subject to 'Section 4 Phase 1 Mid-Size Boilers' standards of Chapter 138 which establishes a NOx RACT limit of 0.40 lb/MMBtu for mid-size boilers licensed to fire biomass and oil. Stack test data for Boiler #1 previously submitted to the DEP confirms that this boiler meets the 0.40 lb/MMBtu NOx RACT emission limit. Huber will perform NOx emission stack testing in accordance with 40 CFR Part 60 or other methods approved or required by the Department, to demonstrate its ability to meet the 0.40 lb/MMBtu NOx emission limit in 2003 and every other year thereafter.

PSD BACT Limits

The Huber plant was initially subject to Prevention of Significant Deterioration (PSD) review in 1982. Best Available Control Technology was applied to the boiler at that time. The 1982 license was replaced by Huber's 1993 PSD license. Huber's 1993 PSD license, as amended, limits the use of oil in the boiler and dryers to a total of 14,085 gallons per day and 350,000 gallons per year on a 12-month rolling total of No. 2 fuel oil containing 0.5% sulfur by weight or less, or an amount of No. 2 fuel oil with the sulfur quantity equivalent. Huber is required to maintain records of daily fuel oil use and records of monthly fuel use of all other types of fuels.

Under Huber's 1993 PSD license, as amended, Boiler #1 was limited to the following BACT emission limits while firing wood:

Pollutant	Lb/MMBtu	Lb/hr	TPY
PM	0.12	10.1	44.2
PM_{10}	---	10.1	44.2
SO_2	---	0.8	3.2
NOx	0.40*	33.6	153.3
CO	---	50.0	219.0
VOC	---	10.0	43.8

* This is a NOx RACT limit.

When required by this license, or otherwise upon request of the Department, compliance with the limits set forth above shall be determined by a stack test conducted in accordance with the following stack test methods:

PM and PM_{10} - 40 C.F.R. Part 60, Appendix A, Method 5
SO_2 - 40 C.F.R. Part 60, Appendix A, Method 6
NOx - 40 C.F.R. Part 60, Appendix A, Method 7
CO - 40 C.F.R. Part 60, Appendix A, Method 10
VOC - 40 C.F.R. Part 60, Appendix A, Method 25A

Streamlining

Opacity
Huber accepts streamlining for opacity requirements. Chapter 101, Section 2(D) of the Department's regulations and Best Available Control Technology (BACT) limits set forth in Huber's 1993 air license, as amended, are applicable. The BACT opacity limit is more stringent. Therefore, only the more stringent BACT opacity limit is included in this license.

Particulate Matter
Huber accepts streamlining for particulate matter requirements. Chapter 103 § 2(A)(3) of the Department's regulations and BACT requirements are applicable. The BACT particulate matter limit is more stringent. Therefore, only the more stringent BACT particulate matter limit is included in this license.

Sulfur Dioxide
Huber accepts streamlining for sulfur dioxide requirements. Chapter 106 and BACT requirements are applicable. The BACT limit for sulfur dioxide is more stringent. Therefore, only the more stringent BACT sulfur dioxide limit is included in this license.

Periodic Monitoring

Recordkeeping of fuel oil use in the boiler on a daily and monthly basis and percent sulfur by weight based on fuel oil supplier receipts.

Monthly records of steam production from the boiler and calculations of wood fuel used in the boiler on a monthly basis based on steam production.
Stack testing of PM and NOx emission rates in 2003 and every other year thereafter.

Periodic monitoring for particulate matter emissions from Boiler #1 shall be the following, taken once per shift:

- EFB voltage and amperage on each bed and ionizer.

C. Temporary Package Boiler

Huber is permitted to utilize a temporary No. 2 oil-fired portable package boiler for up to 4 weeks (28 days) per calendar year when the Boiler #1 is unavailable to produce steam at design pressure due to maintenance or repairs. The package boiler shall not exceed 52.4 MMBtu/hr, which is the nominal oil-firing capacity of Boiler #1. Huber may burn only No. 2 oil with a sulfur content not to exceed 0.5% by weight in the temporary package boiler. Oil used in the boiler will be included in determining compliance with the daily and 12-month rolling facility-wide oil use limits.

Periodic Monitoring

Huber must maintain records of the dates and times of operation of the temporary package boiler and, on a daily basis, the amount of oil used in the boiler.

D. Dryers 1 and 2

Huber operates a core flake dryer and a surface flake dryer as part of its OSB production process. The dryers are fired by wood suspension burners, and oil burners which provide backup or supplementary heat input. Wood waste from the production processes at the plant serves as the primary source of fuel for the dryers. The two dryers vent through a common stack, which also serves the plant's Boiler #1. The emissions from the dryers are controlled by a wet ESP. If the ESP malfunctions, Huber may operate the dryers without the wet ESP being energized for a period of up to 2 consecutive days provided the quench chamber is operating. Huber may request additional time from the Department if Huber is unable to repair the ESP within the 2-day timeframe. Particulate emissions during

these times when the wet ESP is not running can not exceed the modeled emission rate of 20.6 lb/hr from the common stack on a 24-hour average basis.

NOx RACT Requirements

In 1996 DEP issued an amendment to Huber's 1993 PSD license in which DEP approved an alternative NOx RACT determination for the two dryers. As part of that alternative RACT determination, the Department determined that additional controls were not feasible. The Department determined that NOx RACT for the dryers was an emission rate of 0.25 lbs/MMBtu and that stack testing would be required to demonstrate compliance.

PSD BACT Requirements

As described above, Huber applied for and received a PSD permit in 1993. In the course of the 1993 licensing, both dryers underwent BACT review. The Department determined that BACT for the dryers was the operation of a wet electrostatic precipitator, the use of wood as a fuel and limiting the annual usage of No. 2 fuel oil.

Huber's 1993 PSD license was subsequently amended to revise NOx and VOC lb/hr limits. These revisions constituted a minor modification and did not trigger PSD requirements.

Under Huber's 1993 air emission license, as amended, each dryer is limited to the following BACT emission limits when firing wood.

Pollutant		**Lb/hr**
PM	0.020 gr/dscf	6.02
PM_{10}	0.020 gr/dscf	6.02
SO_2	-	0.56
NOx	0.25 lb/MMBtu	12.5
VOC	-	41.8*
CO	-	90.0

* This limit applies to the total combined emissions from both dryers and the press vent.

When required by this license, or otherwise upon request of the Department, compliance with the limits set forth above shall be determined by a stack test in accordance with the following stack test methods:

PM and PM_{10} - 40 C.F.R. Part 60, Appendix A, Method 5
SO_2 - 40 C.F.R. Part 60, Appendix A, Method 6

NOx	- 40 C.F.R. Part 60, Appendix A, Method 7
CO	- 40 C.F.R. Part 60, Appendix A, Method 10
VOC	- 40 C.F.R. Part 60, Appendix A, Method 25A

Streamlining

Opacity
Huber accepts streamlining for opacity requirements. Chapter 101, Section 2(D) of the Department's regulations and Best Available Control Technology (BACT) limits set forth in Huber's 1993 air license are applicable. The BACT opacity limit is more stringent. Therefore, only the more stringent BACT opacity limit is included in this license.

Particulate Matter
Huber accepts streamlining for particulate matter requirements. Chapter 103 § 2(A)(3) of the Department's regulations and BACT requirements are applicable. The BACT particulate matter limit is more stringent. Therefore, only the more stringent BACT particulate matter limit is included in this license.

Sulfur Dioxide
Huber accepts streamlining for sulfur dioxide requirements. Chapter 106 and BACT requirements are applicable. The BACT limit for sulfur dioxide is more stringent. Therefore, only the more stringent BACT sulfur dioxide limit is included in this license.

Periodic Monitoring

Recordkeeping of fuel oil use in the dryers based on total daily and monthly oil consumed in both dryers combined and percent sulfur by weight based on fuel oil supplier receipts.

Stack testing of PM and NOx emission rates shall be conducted in 2003 and every other year thereafter.

Periodic monitoring for particulate matter emissions from the dryers shall be the following, taken once per shift:

- Voltage and amperage for each ESP.

E. OSB Press

Huber's press compacts wood flakes, binders and wax into OSB product. Release agents and catalysts may also be used on the press. Emissions from the press pass

through a separate 96-foot stack. In the course of the 1993 PSD licensing, the press underwent BACT review. The Department determined that BACT for the press was proper maintenance and operation and that BACT did not require add-on controls. Under Huber's 1993 air emission license, as amended, the press was limited to the following BACT emission limits:

Pollutant	lb/ton [a]	lb/hr
PM	0.25	4.4
PM_{10}	0.25	4.4
VOC	--	41.8 [b]

a Emission limit is based on lbs. of particulate per ton of finished product
b This limit applies to the total combined emissions from both dryers and the press vent.

Periodic monitoring

Periodic monitoring for the press is maintenance of production records demonstrating tons of product output on a daily basis and on an annual average daily production basis. Stack tests for PM and VOC shall be conducted in 2003 and every other year thereafter.

F. Ink Jet Printer

The ink jet printer system is used to apply logos and nail grids to the OSB products through printer heads at the facility's sanding machine. The inks utilized are solvent-based. The average VOC content of the inks has been approximately 6.9 pounds of VOC per gallon. Based upon the use of 6.7 gallons of ink per day (on a monthly average basis) and the average of 6.9 pounds of VOC per gallon of ink, potential annual VOC emissions is 8.4 tons. Huber is limited by license condition to 8.0 tons per year of VOC emissions from the ink jet printer. The average VOC content and monthly usage figures in this paragraph are not limits. Huber may utilize different types and amounts of inks provided it limits annual VOC emissions from the ink jet printer to 8.0 tpy. In 2001, DEP determined that BACT for the ink jet printer is the use of good housekeeping practices and maintenance of records of the amount of ink used and the amount of VOC in the ink on a monthly basis and 12-month rolling total basis.

Periodic Monitoring

Periodic monitoring for the ink jet printer consists of maintaining records of the VOC content of inks utilized, the amount of inks used and the amount of VOCs in the inks on a monthly basis and 12-month rolling total basis.

G. Edge-spraying

Huber conducts several different types of edge-coating activities on its OSB. Huber applies only coatings containing 2% VOCs or less. BPT for edge coating is the continued use of coatings containing not more than 2% VOCs and keeping records of the VOC and coating amounts.

H. Blending and Forming Vents

The dried wood strands are fed into blending drums where binders and wax are applied to the strands prior to being formed into mats and pressed. A ventilation system maintains the blenders and formers under negative pressure to ensure adequate indoor air quality. The air removed by the system is filtered to remove particulate matter and vented to the outdoors through a wall vent. Based on limited on-site emissions sampling, Huber believes that the blenders and former may emit less than one ton per year of VOCs. Given the minimal level of VOC emissions from these units, BPT does not require controls. These units are subject to the generic opacity limits in Chapter 101 for general process sources. There are no other applicable requirements for these vents at this time.

I. Dust Handling Systems

Huber operates the following dust handling and control systems:

1. Dust & fines baghouse,
2. Trim & grade baghouse
3. Sanding baghouse, and
4. Dry fuel bin and baghouse.

In order to minimize fugitive emissions, Huber will follow an established Best Management Practices (BMP) plan for all plant dust handling and control systems. The BMP shall be available to the Department upon request. For the dust handling systems, Huber shall:

1. Maintain an alarm system and proper operating condition.
2. Maintain all baghouses to achieve visible emissions no greater than 10% opacity on a 6-minute average basis except for one 6-minute period per hour.
3. Take corrective action if opacity exceeds 5% from the baghouses.
4. Inspect the dust collection and control systems for leaks and malfunctions as described in Huber's BMP plan.

J. Gasoline Tank

Huber operates a 550-gallon gasoline tank which provides gasoline for Huber's vehicles. The tank is equipped with a submerged fill pipe that extends to within 6 inches of the bottom of the tank.

Periodic monitoring

Huber shall maintain records of the amount of gasoline throughput of the tank on a monthly basis.

K. Parts Washers

Huber shall label any parts washers with operational standards, equip the washers with covers if the vapor pressure is >15 mmHG at 100°F, close covers when not in use, drain parts for 15 seconds or longer, keep drafts < 40 m/minute, repair leaks, and keep records of solvent added and removed. Huber shall not degrease porous material. [MEDEP Chapter 130]

L. Facility Emissions

The following is the sum of all emission limits in this license (for all emission equipment in Section I.B. of this Title V license) which is used to calculate the license fees. Emissions from equipment or activities for which there are no applicable emissions limits in this license are not included in this section.

Annual Emissions for the Facility
(used to calculate the license fee)

Equipment	PM	PM_{10}	SO_2	NO_X	CO	VOC
Boiler #1 and Temp Package Boiler	44.2	44.2	7.5	147.1	219.0	43.8
Dryer #1	26.4	26.4	2.5	54.8	394.2	87.6 *
Dryer #2	26.4	26.4	2.5	54.8	394.2	87.6 *
Press Vent	19.4	19.4	--	--	--	7.8 *
Ink jet printer	--	--	--	--	--	8.0
TOTALS	**116.4**	**116.4**	**12.5**	**256.7**	**1007.4**	**234.8**

* Dryer 1, Dryer 2, and the Press Vent are subject to a combined lb/hour limit for VOC of 41.8 which is equivalent to 183 tpy.

III. AIR QUALITY ANALYSIS

As part of its application for its 1993 PSD air license, Huber submitted an ambient air quality analysis demonstrating that emissions from the facility at licensed emissions rates, in conjunction with all other sources, do not violate ambient air quality standards at licensed emissions rates. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-62-70-A-I pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Huber pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

Standard Statements

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The

Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether Huber has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

(a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

(b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October, 1999.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
a.	Boiler #1	40 CFR Part 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Commenced construction prior to June 9, 1989
b.	Dryers #1 and #2	40 C.F.R. Part 60 Subpart Dc	Standards of performance to new stationary sources	Dryers #1 and #2 are not "steam generating units."
c.	Facility	40 C.F.R. Part 63 Subpart U	National emission standards for hazardous air pollutant emissions: Group I polymers and resins	Facility does not produce Group I polymers or resins.
d.	Facility	40 C.F.R. Part 63 Subpart W	National emission standards for hazardous air pollutant emissions for epoxy resins production and non-nylon polyamides production	Facility does not produce epoxy resins or non-nylon polyamides
e.	Facility	40 C.F.R. Part 63 Subpart JJ	National emission standards for wood furniture manufacturing operations	Facility does not produce wood furniture
f.	Facility	40 C.F.R. Part 63, Subpart QQQQ	National emission standards for surface coating of wood building products	Facility does not surface coat wood building products
f.	Dryers #1 and #2 and OSB press	Chapter 134	VOC RACT	As per Section 1(C)(2), of Chapter 134, dryers and press vent are not subject to VOC RACT because they were previously subject to BACT
g.	Wood yard operations	Chapter 134	VOC RACT	As per Section 1(C)(6), emissions from wood yards are not subject to VOC RACT
h.	Ink jet Printer	Chapter 129	Surface coating facilities	Huber's OSB is not considered "flat wood paneling" for purposes of Chapter 129

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

(a) Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

(b) Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

(c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

(d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request;

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions;

(6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, digital data, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:

(i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to

the Department that equipment may be operating out of compliance with emission standards or license conditions;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii) pursuant to any other requirement of this license to perform stack testing.

(b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(c) submit a written report to the Department within thirty (30) days from date of test completion.

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

(a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

(c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control

systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

a. The licensee shall notify the Commissioner within 2 business days of a violation in emission standards and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

b. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

> Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

c. All other deviations shall be reported to the Department in the facility's semiannual report.

(11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

(13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

(a) The identification of each term or condition of the Part 70 license that is the basis of the certification;

(b) The compliance status;

(c) Whether compliance was continuous or intermittent;

(d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(e) Such other facts as the Department may require to determine the compliance status of the source;

SPECIFIC CONDITIONS

(14) **Boiler 1**

A. Huber may fire in Boiler #1 wood, and wood waste from the plant's manufacturing operations (including scrap OSB, pallets, untreated lumber and sawdust), waste office paper and cardboard generated on-site, No. 2 fuel oil, on-specification waste oil, grease, wax, particulate/water mixture from the wet ESP, and other non-hazardous wood product process residues. [MEDEP Chapter 115, BACT]

B. Emissions from Boiler #1 shall not exceed the following limits while firing wood:

Pollutant	lb/MMBtu	Origin and Authority
PM	0.12	MEDEP Ch. 115, BACT
PM_{10}	0.12	MEDEP Ch. 115, BACT
NO_X	0.40	MEDEP Ch. 138, NOx RACT

Pollutant	lb/hr	Origin and Authority
PM	10.1	MEDEP Ch. 115, BACT
PM_{10}	10.1	MEDEP Ch. 115, BACT
SO_2	0.8	MEDEP Ch. 115, BACT
NO_X	33.6	MEDEP Ch. 115, BACT
CO	50.0	MEDEP Ch. 115, BACT
VOC	10.0	MEDEP Ch. 115, BACT

C. For Boiler #1, Dryer 1 and Dryer 2 combined, Huber shall not exceed 14,085 gallons/day or 350,000 gallons/year on a 12-month rolling total of No. 2 fuel oil containing 0.5% sulfur by weight or less or an amount of No. 2 fuel oil with a sulfur quantity equivalent. Huber shall not combust any fuel with

sulfur content exceeding 0.5% without prior written consent from the Department. [MEDEP Chapter 115, BACT]

D. Compliance with the fuel oil limits shall be based on records of fuel use and fuel oil supplier receipts. Huber shall maintain a record of fuel oil used in the boiler and in the dryers on a daily and monthly basis and shall maintain records of fuel oil supplier receipts. [MEDEP Chapter 115, BACT]

E. Huber shall maintain records of steam production from the boiler and calculations of wood fuel used in the boiler based on steam production on a monthly basis.

F. Particulate matter (PM, PM_{10}) emissions from Boiler #1 shall be controlled by the operation and maintenance of an electrostatic filter bed (EFB). Huber shall operate, at a minimum, the number of electrified filter beds that operated during the most recent demonstration of compliance with licensed particulate emissions limits. Huber is permitted to shut off the voltage to the EFB for an average 10 minutes every 8 hours of operation to allow for inspection of gravel flow. In addition, Huber is not required to operate the EFB during startup until proper operating temperature is achieved, or while burning only oil. Huber shall maintain records of EFB downtime. [MEDEP Chapter 115, BACT]

G. Visible emissions from the stack for Boiler #1 and the dryers shall not exceed 20% for more than two (2) six (6)-minute block averages in a 3-hour period. [MEDEP Chapter 115, BACT]

H. Huber shall monitor and record the voltage and amperage (periodic monitors) once every shift on each EFB bed and ionizer. The requirement to record voltage and amperage does not apply during periods of periodic monitor malfunction. [MEDEP Chapter 140, BPT]

I. Huber shall conduct stack testing for PM using 40 C.F.R. Part 60, Appendix A, Method 5 and stack testing for NOx using 40 Part 60, Appendix A, Method 7, in 2003 and every other year thereafter. [MEDEP Chapter 115, BACT]

J. Huber may utilize a temporary No. 2 oil-fired portable package boiler for up to 4 weeks (28 days) per calendar year when the Boiler #1 is unavailable to produce steam at design pressure due to maintenance or repairs. The package boiler shall not exceed 52.4 MMBtu/hr of No. 2 oil with a sulfur content not to exceed 0.5% by weight. Oil used in the package boiler shall be included in the facility-wide totals when determining compliance with Condition 14(C).

Huber shall maintain records of the dates and times of operation and of oil used in the temporary package boiler in accordance with Condition 14 (D). The package boiler shall meet all applicable requirements, including any applicable requirements of 40 C.F.R. Parts 60 and 63. [MEDEP Chapter 140, BPT]

(15) **Dryers #1 and #2**

A. Huber shall burn only wood and wood waste from the process and No. 2 fuel oil containing 0.5% sulfur by weight or less in the dryers.

B. Huber shall maintain records of fuel oil used in the dryers based on total daily and monthly oil consumed in both dryers combined and percent sulfur by weight based on fuel oil supplier receipts. [MEDEP Chapter 140, BPT]

C. The emissions from each dryer shall not exceed the following while firing wood.

Pollutant	gr/dscf	Origin and Authority
PM	0.020*	ME DEP Ch. 115, BACT
PM_{10}	0.020*	

* Corrected to 17.0% O_2.

Pollutant	Lbs/MMBtu	Origin and Authority
NOx	0.25	ME DEP Ch. 138, NOx RACT

Pollutant	Lbs/Hr	Origin and Authority
PM	6.02	ME DEP Ch. 115, BACT
PM_{10}	6.02	ME DEP Ch. 115, BACT
SO_2	0.56	ME DEP Ch. 115, BACT
NOx	12.5	ME DEP Ch. 115, BACT
VOC	41.8**	ME DEP Ch. 115, BACT
CO	90.0	ME DEP Ch. 115, BACT

** This limit applies to the total combined emissions from both dryers and the press vent.

D. Visible emissions from the stack for Boiler #1 and the dryers shall not exceed 20% for more than two (2) six (6)-minute block averages in a 3-hour period. [MEDEP Chapter 115, BACT]

E. Except as follows, Huber shall operate, at a minimum, the number of ESP chambers and number of fields per chamber in its wet ESPs that operated during the most recent demonstration of compliance with the licensed particulate emission limit.

(i) If the wet ESPs malfunction, Huber may continue to operate the dryers for up to two consecutive days in order to undertake repairs to the wet ESPs provided the quench chambers of the wet ESPs are operating. If repairs cannot be completed within two days, Huber may request an extension from the Bureau of Air Quality. Particulate emissions during these times when the wet ESP is not running shall not exceed the modeled emission rate of 20.6 lb/hr from the common stack on a 24-hour average basis.

[MEDEP Chapter 115, BACT]

F. Huber shall record the voltage and amperage (periodic monitors) once every shift for each ESP. The requirement to record voltage and amperage does not apply during periods of downtime or repair of the ESP or during periodic monitor malfunction allowed by Condition 25(A)(2). [MEDEP Chapter 140, BPT]

G. Huber shall conduct VOC stack tests per 40 C.F.R. Part 60, Appendix A, Method 25A, on the emissions from the two dryers and the press vent in 2003 and every other year thereafter to determine compliance with the combined lbs/hr limit. The tests of the dryers and press vent do not need to be conducted simultaneously, but must be conducted within 48 hours and under similar operating conditions as approved by the Department.

H. Huber shall conduct NOx stack testing per 40 C.F.R. Part 60, Appendix A, Method 7, and PM testing per 40 C.F.R. Part 60, Appendix A, Method 5 for each of the dryers in 2003 and every other year thereafter to determine compliance with the NOx and PM limits, respectfully. [MEDEP Chapter 115, BACT]

I. Huber may bypass the secondary collectors. If it does, Huber must demonstrate compliance with PM limits for the dryers by EPA Method 5 within 90 days. [MEDEP Chapter 140, BPT]

J. Huber will maintain a spare parts inventory on site as suggested by the manufacturer of the wet ESP. [MEDEP Chapter 115, BACT] [Enforceable by state-only]

(16) **Press Vent**

A. Emissions from the press vent shall not exceed the following:

Pollutant	***lbs/Hr***	***Origin and Authority***
PM	4.4	ME DEP Ch. 115, BACT
PM_{10}	4.4	ME DEP Ch. 115, BACT
VOC	41.8*	ME DEP Ch. 115, BACT

* This limit applies to the total combined emissions from both dryers and press vent.

B. Huber shall conduct VOC stack tests per 40 C.F.R. Part 60, Appendix A, Method 25A, on the emissions from the press vent and dryers in 2003 and every other year thereafter to determine compliance with the combined lbs/hr limit. The tests of the dryers and press vent do not need to be conducted simultaneously, but must be conducted within 48 hours and under similar operating conditions. [MEDEP Chapter 140, BPT]

C. Huber shall conduct stack testing per 40 C.F.R. Part 60, Appendix A, Method 5 for PM emissions from the press vent in 2003 and every other year thereafter to determine compliance with the PM limits.
[MEDEP Chapter 115, BACT]

D. Huber may use alternative glues, waxes, resins, release agents or other substances in the process upon notification to the Department. Huber may run trials with such new substances for a period up to 90 days. Huber shall provide notice to the DEP not later than 2 weeks after permanently switching to use of new substances. Upon request of the Department, Huber may be required to conduct stack tests to demonstrate compliance with this license after making the permanent switch to a new substance. [MEDEP Chapter 140, BPT]

(17) **Production Rates**

J.M. Huber shall notify the Department in writing within 30 days of first exceeding 500 tons/day production, 525 tons/day production, 550 tons/day production, etc., on a 14-day rolling average daily production rate basis. Huber shall maintain records documenting daily production rates and calculate the ongoing 14-day rolling average daily production rates. Huber shall stack test for NOx, PM, and VOC from each of the dryers and stack test for PM and VOC from

the press vent to demonstrate compliance with applicable emission limits upon Department request. In determining whether to require Huber to conduct such testing, the Department shall consider the production levels during prior emission tests conducted by Huber and the frequency at which the increased production levels are achieved by Huber.

Huber shall maintain records documenting daily production rates, 14-day rolling average daily production rates and 12-month average daily production rates updated monthly. [MEDEP Chapter 140, BPT]

(18) **Ink Jet Printer**

Huber shall maintain monthly records of the amounts and VOC content of ink used in the ink jet printer and records of maintenance and tune-ups/repairs. The total VOC emission shall not exceed 8 tons per year on a 12-month rolling total from this process. [MEDEP Chapter 140, BPT]

(19) **Edge-spraying**

Huber shall not use edge coatings containing greater than two percent VOCs. Huber shall maintain documentation from the suppliers to demonstrate VOC content of its edge coatings and maintain documentation with amount of VOC emitted. [MEDEP Chapter 140, BPT] [Enforceable by state only]

(20) **Dust Handling Systems**

Huber operates the following dust handling and control systems:

1. Dust & fines baghouse,
2. Trim & grade baghouse
3. Sanding baghouse, and
4. Dry fuel bin and baghouse.

In order to minimize fugitive emissions, Huber will follow an established Best Management Practices (BMP) plan for all plant dust handling and control systems. The BMP shall be available to the Department upon request. For the dust handling systems, Huber shall:

1. Maintain an alarm system and proper operating condition.
2. Maintain all baghouses to achieve visible emissions no greater than 10% opacity on a 6-minute average basis except for one 6-minute period per hour.

3. Take corrective action if opacity exceeds 5% from the baghouses.
4. Inspect the dust collection and control systems for leaks and malfunctions as described in Huber's BMP plan.

[MEDEP Chapter 140, BPT] [Enforceable by state only]

(21) **Gasoline Storage Tank**

A. The fill pipe shall extend within 6 inches of the bottom of the gasoline storage tank. [MEDEP Chapter 118]
B. Huber shall maintain records of the monthly and annual throughput of gasoline. [MEDEP Chapter 118]

(22) **Parts Washers**

The parts washers are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

A. Huber shall keep records of the amount of solvent added to each parts washer.
B. Huber shall attach a permanent conspicuous label to each unit summarizing the following operational standards of Chapter 130:
   1. Equip each cold cleaning degreaser with a cover that is easily operated with one hand if:
      a. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 ^{o}F by ASTM D323-89; or,
      b. the solvent is agitated; or,
      c. the solvent is heated.
   2. Close the covers when the tanks are not in use;
   3. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
   4. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
   5. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
   6. Minimize drafts to less than 40 meters/minute;
   7. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired; and

   [MEDEP Chapter 130]

(23) **Fugitive PM Emissions**

Potential sources of fugitive PM emissions including material stockpiles, paved, and unpaved roadways shall be controlled as necessary by wetting with water,

with calcium chloride, or other methods as approved by the Bureau of Air Quality to prevent visible emissions in excess of 20% except for no more than five (5) minutes in any one-hour period. [MEDEP Chapter 101]

(24) **General Process Sources**

All conveyers and transfer points equipped with fabric filters venting to ambient air shall not exceed an opacity of 10% on a 6-minute block average basis, except for no more than one 6-minute block average in a 1-hour period. Huber shall take corrective action if visible emissions from the fabric filters exceed five (5) percent opacity. [MEDEP Chapter 101]

(25) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The initial semiannual report is due January 31, 2004. .

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.

B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(26) **Annual Compliance Certification**

The licensee shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 31, 2004. [MEDEP Chapter 140]

(27) **A. Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

1) A computer program and accompanying instructions supplied by the Department;

   or

2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

B. **Toxic Air Pollutants Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall report the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

(28) The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(29) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B.
[40 CFR, Part 82, Subpart F]

(30) **Asbestos Abatement**
When undertaking Asbestos abatement activities, Huber shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(31) **Certification by a Responsible Official**
All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(32) Huber shall pay the annual air emission license fee within 30 days of May 31st of each year. Pursuant to Title 38-353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

(33) The term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R.GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 19, 1998
Date of application acceptance: March 24, 1998

Date filed with the Board of Environmental Protection _____

This Order prepared by Edwin Cousins, Bureau of Air Quality.